

REMARKS

The amendment filed herewith is intended as a Supplemental Amendment to the previously filed response to Office Action. A response to the Office Action dated March 7, 2002, was filed on June 7, 2002. Claims 1, 4, and 6 have been amended, claims 2, 3, 5, 8-10, and 28-31 have been cancelled, claims 12-27 have been withdrawn, and new claims 33 and 34 have been added to the application. Applicants have amended claim 1 to more clearly define the invention and to correct a typographical error. As amended, Applicants believe the claims are in condition for allowance. In addition, Applicants respectfully submit that the *Fast* reference (U.S. Patent No. 4,064,938) cited by the Applicants in an information disclosure statement filed on June 14, 2003, or any of the references cited, do not teach, show or suggest an apparatus for preventing erosion of wellbore components comprising a wellscreen assembly having a perforated inner tube and at least one screen disposed therearound, the screen being fluid-porous; and a coating disposed on the wellscreen assembly wherein the is a metal-based coating including nickel in a concentration of about 85% to 95% as recited in amended independent claim 1. In addition, Applicants respectfully submit that the *Fast* reference, or any of the references cited, do not teach, show or suggest an apparatus for preventing erosion of wellbore components comprising a wellscreen assembly having a perforated inner tube and at least one screen disposed therearound, the screen being fluid-porous, and a coating disposed on the wellscreen assembly wherein the coating is a cermet as recited in new independent claim 33. Additionally, Applicants respectfully submit that the *Fast* reference, or any of the references cited, do not teach, show or suggest an apparatus for preventing erosion of wellbore components comprising a wellscreen assembly having a perforated inner tube and at least one screen disposed therearound, the screen being fluid-porous, and a coating disposed on the wellscreen assembly wherein the coating is an organic-based coating as recited in new independent claim 34. Accordingly, Applicants respectfully request allowance of independent claims 1, 33 and 34, and any claims that depend therefrom.

CONCLUSION

The references, neither alone nor in combination, teach, show, or suggest an apparatus as recited in the pending claims. The prior art made of record is noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, it is believed that a detailed discussion of the secondary references is not deemed necessary for a full and complete response to this office action. Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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